

MEMORANDUM ENDORSED**KELLY & CURTIS, PLLC**
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July 10, 2023

VIA ELECTRONIC FILING

The Honorable Gregory H. Woods, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2260
New York, New York 10007

RE: The Travelers Indemnity Company v. Starr Indemnity & Liability Company
Docket No. : 1:23-CV-02424-GHW
Our File No. : 03-1895.CVS

Dear Judge Woods:

Our office represents defendant Starr Indemnity & Liability Company ("Starr") in the above-referenced matter. This matter is a declaratory judgment action wherein plaintiff seeks coverage on behalf of its named insured on a commercial general liability policy issued by Starr.

Attached herewith please find a proposed Stipulation and Order Extending Time to Respond to Complaint. Starr seeks an extension of time to respond to the Complaint until September 12, 2023.

Starr's answer is presently due on July 14, 2023. Our office was only recently provided with all relevant files from Starr, and the delay in the provision of such files was the basis for earlier requests to extend Starr's time to answer and any associated delays. Our review and analysis of the relevant Starr insurance policy and claims materials indicates the strong likelihood of a settlement with plaintiff. Our office has discussed the possibility of settlement with counsel for plaintiff. We have agreed to the mutual exchange of certain documents to facilitate a prompt offer of behalf of Starr, with a hopeful resolution of the action without need for Starr to answer or the parties to engage in formal discovery or motion practice.

The Honorable Gregory H. Woods, U.S.D.J.

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The proposed extension is on consent of all parties. There have been two prior requests for such an extension made to this Court (original answer date of April 21, 2023 to June 12, 2023 to July 14, 2023).

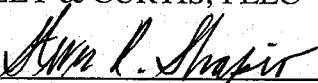
Please note that the new proposed answer date reflects the anticipated absence of counsel and client representatives during the summer holiday and vacation season.

The parties additionally request that the Court adjourn the Initial Pretrial Conference, presently scheduled on July 27, 2023 by telephone at 4:00 p.m., to a date and time of the Court's discretion after Starr's time to answer.

We appreciate the Court's time and consideration in this matter.

Respectfully submitted,

KELLY & CURTIS, PLLC

By: 

Steven R. Shapiro

Attorneys for Defendant

STARR INDEMNITY & LIABILITY
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cc:

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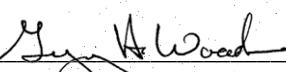
THE TRAVELERS INDEMNITY COMPANY

Defendant's application for an extension of time to answer or otherwise respond to the complaint, Dkt. No. 1, is granted. The deadline for Defendant to answer or otherwise respond to the complaint is extended to September 12, 2023. The parties' July 10, 2023 request to adjourn the initial pretrial conference, Dkt. No. 15, is granted. The initial pretrial conference scheduled for July 27, 2023 is adjourned to September 21, 2023 at 2:00 p.m. The joint status letter and proposed case management plan described in the Court's March 24, 2023 order are due no later than September 14, 2023.

The Clerk of Court is directed to terminate the motion pending at Dkt. No. 16.

SO ORDERED.

Dated: July 10, 2023
New York, New York


GREGORY H. WOODS
United States District Judge